

# THE LAW FIRM OF DMITRIY SHAKHNEVICH

ADMITTED IN NEW YORK AND NEW JERSEY

May 8, 2019

**VIA ECF**

Honorable Margo K. Brodie  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: United States of America v. Nadel et al  
**Case No.: 19-CV-01578-MKB-CLP, Eastern District of New York**

Dear Judge Brodie:

This office represents the Defendants in the above-referenced action. In sum and substance, the allegations in this matter are that the Defendants operate as moving companies/brokers on the Internet. When orders are placed, Defendants allegedly quote their customers an original price, and then make representations to secure additional funds from the customers once the customers' property is loaded and ready to be moved. Thereafter, if the customers refuse, the Defendants allegedly keep the customers' property in third-party storage facilities and/or threaten to dispose of said property.

In light of this, the Court issued a Preliminary Injunction, upon consent of the parties, that in part, temporarily restrains the Defendants from "removing personal property originally received from customers for moving, and now stored on the premises of a third-party, from the third-party premises without prior permission and approval from the Court." As such, with the consent of the customers and the United States, the Defendants request that the Court So Order the attached proposed Order permitting the release of the personal property from storage so that the Defendants may deliver the property to the following customers:

Richard Baker

Address: 1400 Church St. NW, Apt. 406, Washington, DC 20005, (443) 515-0046  
c/o Sam Wolland, U.S. Storage Center, Unit 2305, 5405 Wasson Rd., Austin, TX 78745  
(512-217-6862)

Amanda Pasek and Gabriel Blanchet

Address: 581 N Whitewater Park Blvd., Apartment D207, Boise, Idaho 83702  
Amanda Pasek: (860) 918-0095, amandagpasek@gmail.com  
Gabriel Blanchet: (413) 374-0739, gblanchet3@gmail.com

Stephanie Demeritt

Address: Buena Place, Apt. 13302, Windermere, FL 34786  
aresdevile@gmail.com

Victor Smith

Address: 3570 North Carefree Cir, Apt. E, Colorado Springs, Colorado 80917

(803) 357-5567

vicksmitty12@gmail.com

In light of the above, our office respectfully requests that the Court allow Defendants to return the personal property of the aforementioned customers.

For the Court's convenience, a proposed Order is being filed with this letter.

Thank you for the Court's kind consideration of this application.

Very Truly Yours,

Dmitriy Shakhnevich, Esq.

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